

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Securities and Exchange Commission,

Plaintiff,

vs.

Raskob Kambourian Financial Advisors,
Ltd.,

Defendant.

Case No. 4:24-cv-00442-MSA

**FINAL JUDGMENT AS TO
DEFENDANT RASKOB
KAMBOURIAN FINANCIAL
ADVISORS, LTD.**

The Securities and Exchange Commission having filed a Complaint and Defendant Raskob Kambourian Financial Advisors, Ltd. having entered a general appearance; consented to the Court's jurisdiction over Defendant and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating Section 206(2) of the Investment Advisers Act of 1940 (the "Advisers Act") [15 U.S.C. § 80b-6(2)] while acting as an investment adviser, by the use of the mails or any instrumentality of interstate commerce,

1 directly or indirectly, to engage in any transaction, practice, or course of business which
2 operates as a fraud or deceit upon any client or prospective client.

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
4 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following
5 who receive actual notice of this Final Judgment by personal service or otherwise:

6 (a) Defendant's officers, agents, servants, employees, and attorneys; and (b) other persons in
7 active concert or participation with Defendant or with anyone described in (a).

8 II.

9 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
10 Defendant is permanently restrained and enjoined from violating Section 204(a) of the
11 Advisers Act [15 U.S.C. § 80b-4(a)] and Rule 204-2 thereunder [17 C.F.R. § 275.204-2]
12 while acting as an investment adviser registered or required to be registered under Section
13 203 of the Advisers Act [15 U.S.C. §80b-3], by failing to make and keep true, accurate, and
14 current books and records relating to its investment advisory business, as required under
15 Rule 204-2 [17 C.F.R. § 275.204-2].

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
17 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following
18 who receive actual notice of this Final Judgment by personal service or otherwise:

19 (a) Defendant's officers, agents, servants, employees, and attorneys; and (b) other persons in
20 active concert or participation with Defendant or with anyone described in (a).

21 III.

22 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
23 Defendant is permanently restrained and enjoined from violating Section 204(a) of the
24 Advisers Act [15 U.S.C. § 80b-4(a)] and Rule 204-3 thereunder [17 C.F.R. § 275.204-3]
25 while acting as an investment adviser registered under Section 203 of the Advisers Act [15
26 U.S.C. §80b-3], by failing to timely deliver to each client its current brochure, brochure
27 supplement(s), or summary of material changes to its brochure with an offer to provide its
28 current brochure, as required under Rule 204-3 [17 C.F.R. § 275.204-3].

1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
2 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following
3 who receive actual notice of this Final Judgment by personal service or otherwise:

4 (a) Defendant's officers, agents, servants, employees, and attorneys; and (b) other persons in
5 active concert or participation with Defendant or with anyone described in (a).

6 IV.

7 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
8 Defendant is permanently restrained and enjoined from violating Section 206(4) of the
9 Advisers Act [15 U.S.C. § 80b-6(4)] and Rule 206(4)-7 thereunder [17 C.F.R.
10 § 275.206(4)-7], by providing investment advice without adopting and implementing written
11 policies and procedures reasonably designed to prevent violations of the Advisers Act and
12 the rules that the Commission has adopted under the Advisers Act.

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
14 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following
15 who receive actual notice of this Final Judgment by personal service or otherwise:
16 (a) Defendant's officers, agents, servants, employees, and attorneys; and (b) other persons in
17 active concert or participation with Defendant or with anyone described in (a).

18 V.

19 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
20 Defendant is liable for disgorgement of \$1,364,513, representing net profits gained as a
21 result of the conduct alleged in the Complaint, together with prejudgment interest thereon in
22 the amount of \$256,068, and a civil penalty in the amount of \$225,000 pursuant to
23 Section 209(e) of the Advisers Act [15 U.S.C. § 80b-9(e)]. Defendant shall satisfy this
24 obligation by paying \$1,845,581 to the Securities and Exchange Commission within 30 days
25 after entry of this Final Judgment.

26 Defendant may transmit payment electronically to the Commission, which will
27 provide detailed ACH transfer/Fedwire instructions upon request. Payment may also be
28 made directly from a bank account via Pay.gov through the SEC website at

1 <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified check,
2 bank cashier's check, or United States postal money order payable to the Securities and
3 Exchange Commission, which shall be delivered or mailed to

4 Enterprise Services Center
5 Accounts Receivable Branch
6 6500 South MacArthur Boulevard
7 Oklahoma City, OK 73169

8 and shall be accompanied by a letter identifying the case title, civil action number, and name
9 of this Court; Raskob Kambourian Financial Advisors, Ltd. as a defendant in this action;
10 and specifying that payment is made pursuant to this Final Judgment.

11 Defendant shall simultaneously transmit photocopies of evidence of payment and
12 case identifying information to the Commission's counsel in this action. By making this
13 payment, Defendant relinquishes all legal and equitable right, title, and interest in such
14 funds and no part of the funds shall be returned to Defendant.

15 The Commission may enforce the Court's judgment for disgorgement and
16 prejudgment interest by using all collection procedures authorized by law, including, but not
17 limited to, moving for civil contempt at any time after 30 days following entry of this Final
18 Judgment.

19 The Commission may enforce the Court's judgment for penalties by the use of all
20 collection procedures authorized by law, including the Federal Debt Collection Procedures
21 Act, 28 U.S.C. § 3001 et seq., and moving for civil contempt for the violation of any Court
22 orders issued in this action. Defendant shall pay post judgment interest on any amounts due
23 after 30 days of the entry of this Final Judgment pursuant to 28 U.S.C. § 1961. The
24 Commission shall hold the funds, together with any interest and income earned thereon
25 (collectively, the "Fund"), pending further order of the Court.

26 The Commission may propose a plan to distribute the Fund subject to the Court's
27 approval. Such a plan may provide that the Fund shall be distributed pursuant to the Fair
28 Fund provisions of Section 308(a) of the Sarbanes-Oxley Act of 2002. The Court shall
retain jurisdiction over the administration of any distribution of the Fund and the Fund may

1 be delivered or mailed to

2 Enterprise Services Center
3 Accounts Receivable Branch
4 6500 South MacArthur Boulevard
5 Oklahoma City, OK 73169

6 and shall be accompanied by a letter identifying the case title, civil action number, and name
7 of this Court; and specifying that payment is made pursuant to this Final Judgment.

8 VII.

9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Consent is
10 incorporated herein with the same force and effect as if fully set forth herein, and that
11 Defendant shall comply with all of the undertakings and agreements set forth therein.

12 VIII.

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall
14 retain jurisdiction of this matter for the purposes of enforcing the terms of this Final
15 Judgment.

16 Dated: _____, _____

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18 UNITED STATES DISTRICT JUDGE
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